Gina Harrison Director-Federal Regulatory

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Federal Communications Commission
Office of Secretary

Ex Parte

February 11, 1998

Ms. Magalie Roman Salas Secretary Federal Communications Commission Mail Stop Code 1170 1919 M Street, N.W., Room 222 Washington, D.C. 20554

RE: RM-9005 – Routine Licensing of Large Numbers of Earth Stations

Today, Paul Saur, Vice President, Network Operations, Cellular One-Boston, Betsey Granger, Senior Counsel, Pacific Bell Mobile Services, and I met with Paul Misener, Senior Adviser to Commission Furchtgott-Roth and Ari Fitzgerald, Legal Adviser to Chairman Kennard, to discuss issues summarized in the attached material. We are submitting two copies of this notice in accordance with the Commission's rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions.

Sincerely,

Attachment

cc:

A. Fitzgerald

P. Misener

No. of Copies rec'd D42 List ABCDE



Paul Saur Betsy Granger Gina Harrison February 11, 1998



• Introduction:

- bands is important to meeting the wireless communication - Microwave is used to provide reliable, cost effective back haul for CMRS. The availability of appropriate spectrum needs of the United States.
- announced that promise spectrum sharing then require New satellite communication systems continue to be compromising fixed microwave services.
- Fixed microwave services are running out of bands to relocate into.
- Relocation costs into other bands or segments should be paid for by new entrants.



- Overview:
- Microwave Interconnect and CMRS
- Examples of 18 GHz in CMRS Networks
- Spectrum Sharing with Mobile Satellite Operators
- 18 GHz Relocation Options
- 18 GHz Relocation Costs
- Fixed Microwave Service Spectrum Needs



- Microwave Interconnect and PCS
- Microwave deployment depends on cost and capacity
- Microwave interconnect
- Cost
- Availability of leased DS-1
- Space Limitations for GSM PCS Providers
- Single Cabinet
- 5 rack units available for all interconnect functions
- microwave limited to 1 or 2 rack units at most
- Tower limitations



Frequency Range

17.7 - 19.7 GHz TX Power, 19-29 dBm

Currently 20 Systems in use, Capacity 4DS-1 - 1DS3

Currently 4 systems under construction

2 future sites planned

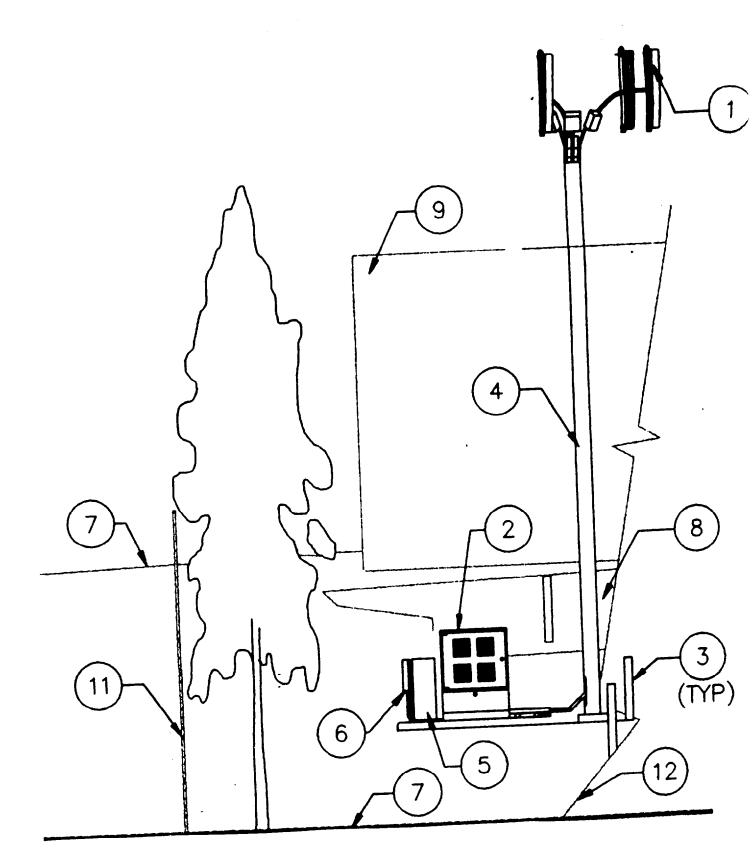


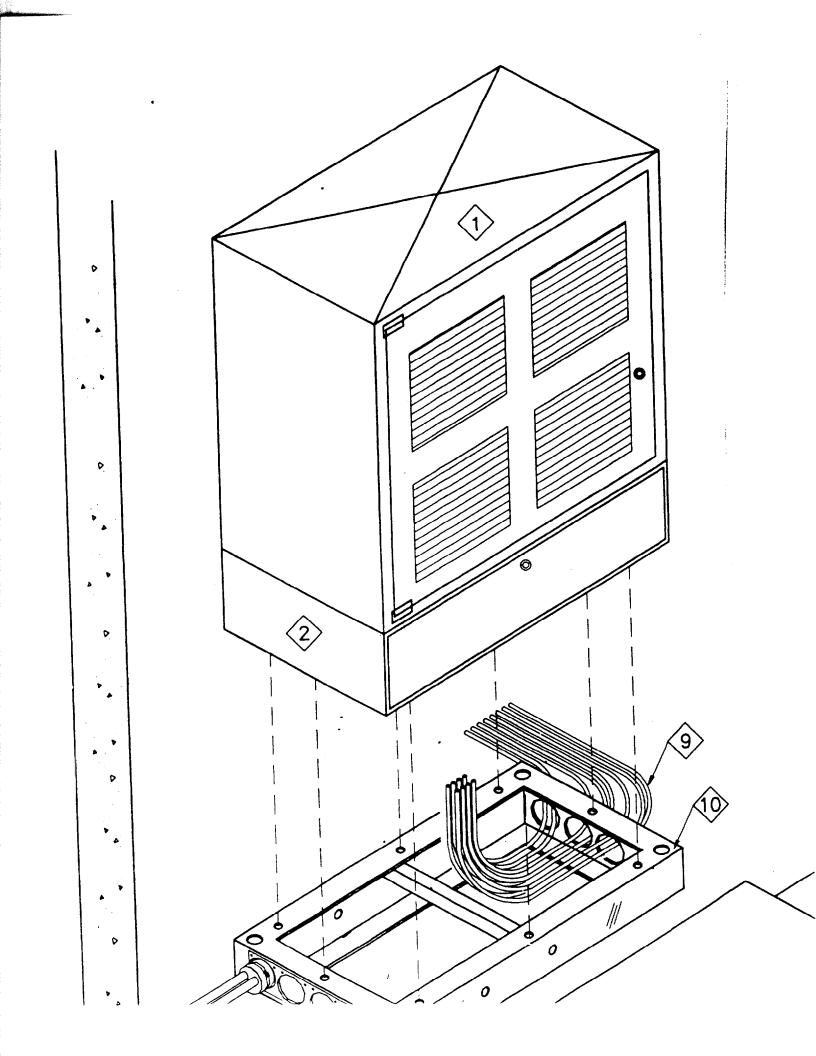
COST EFFECTIVE

- SPACE CONSTRAINT Digital Interface Unit (DIU) takes up on 1 equipment rack space
- May be wall mounted if necessary to eliminate the need for floor space or where floor space is not available
- volts, eliminating external power requirements. within the Microcell cabinet. Most units run 24 or 48 MICROCELL APPLICATIONS - DIU can be placed



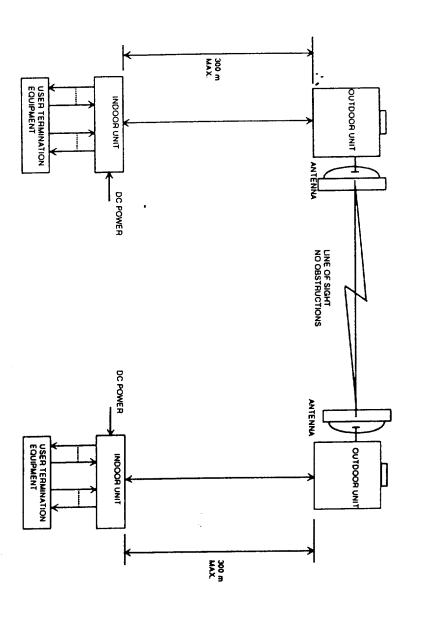
- DISH SIZE Path can be engineered and licensed with a 1' or 2' dish which is more acceptable in many locations.
- more easily obtainable FREQUENCY CONGESTION - 18 GHz frequencies are
- place, based on structural condition TOWER LIMITATIONS - Smaller dishes are easier to





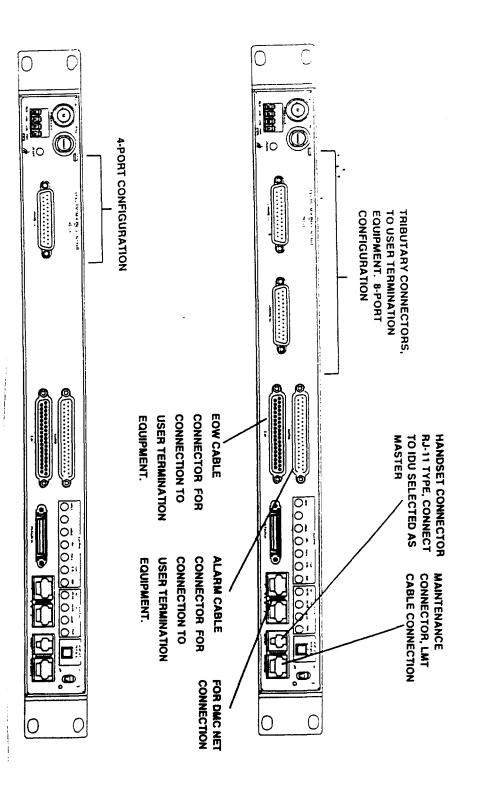


System Block Diagram



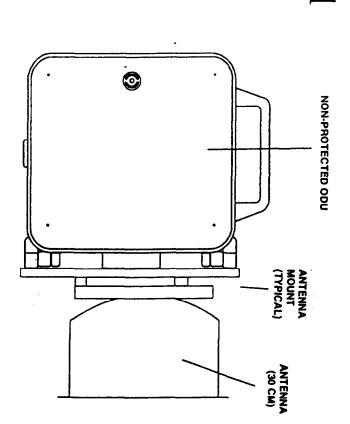


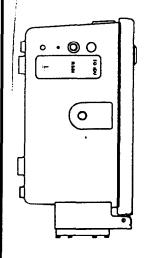
Indoor Unit Detail

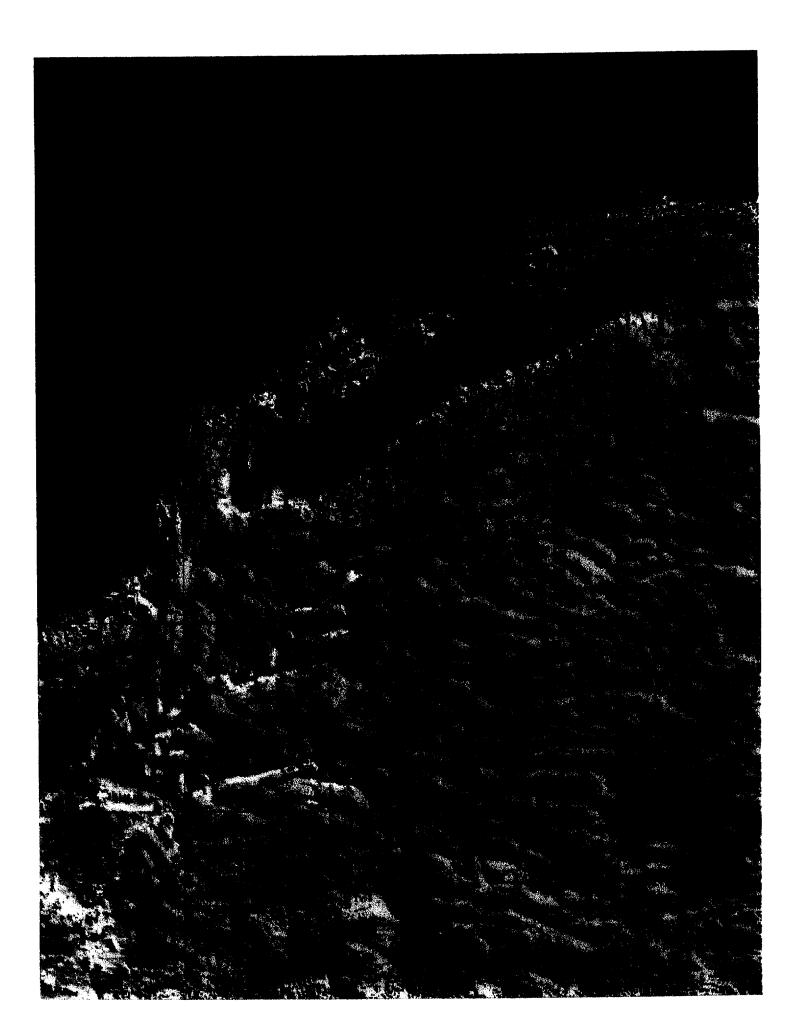




Outdoor Unit Detail









- Examples of 18 GHz in CMRS Networks
- 18 GHz has been used to provide interconnect to rural higher costs. areas that could not be covered without substantially
- I-15 between Barstow and Las Vegas, NV
- I-5 between Stockton and Bakersfield, CA
- 18 20 mile range of 18 GHz fits the 35 km maximum distance of GSM
- Single rack unit eliminates need for buildings, reduces costs, improves reliability
- 60% of PBMS microwave interconnect is 18 GHz. (19% for Cellular One in Boston)



Spectrum Sharing with Mobile Satellite Operators

- Worst Case:
- Main Beam No Antenna Discrimination
- Co-Channel No RF or IF Discrimination

Distance from Terrestrial Receiver to Satellite: 400 km

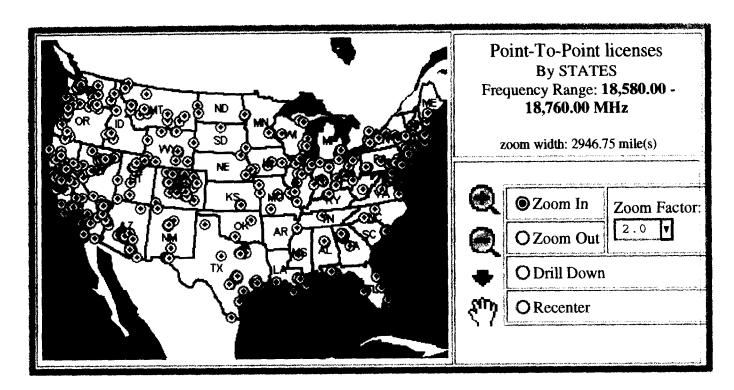
- 4' Antenna at Terrestrial Receiver (44 dBi Gain)
- Free Space Path Loss
- $FSL=32.45 + 20 \log D + 20 \log F = 169.6 dB$
- Maximum Allowable Interference Level:
- -100 dBm, based on 20 dB T/I, per TR-14.11, Bulletin 10-F
- Transmit Signal Level for 100 dBm Interference level:
- $-100 = EIRP_{sat} FSL + Ant Gain$
- $EIRP_{sat} = 25.6 dBm (0.36 W)$



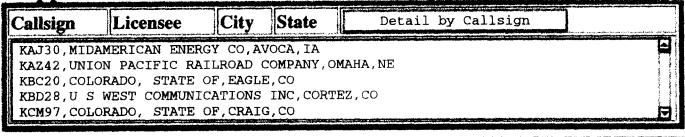
- Spectrum Sharing with Mobile Satellite Operators
- A satellite on the same frequency could cause as little as 25.6 dBm (0.36 W). interference to a terrestrial microwave path transmitting
- Typical satellite operations use transmit powers between 60 and 90 dBm, (1000 to 1,000,000 W)EIRP.
- Typical satellite operation will cause a complete failure for the terrestrial user for as long as these conditions last. This will drop all user calls, including 911.
- Given the number of satellites that are proposed for catastrophic for the terrestrial microwave users ubiquitous coverage, the interference conditions will be



- Spectrum Sharing with Mobile Satellite Operators
- Co-channel spectrum sharing is not a viable option.
- Repeated, short disruptions of service for satellite interference is not tolerable
- sufficient frequency separation between the terrestrial Band segmentation will be required to provide and satellite services
- Relocation costs for the terrestrial services should be paid for by the satellite services



Mapped Licenses:

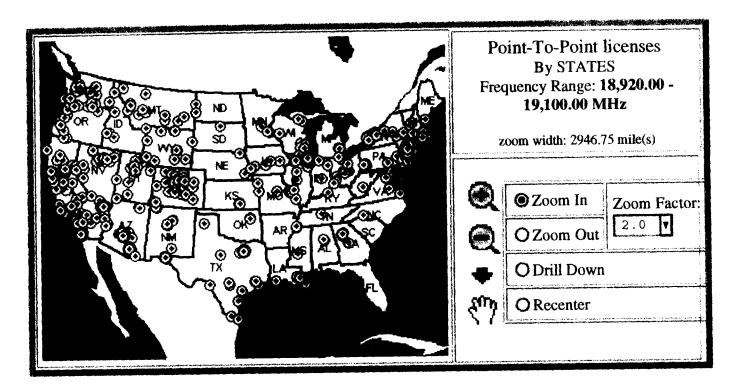


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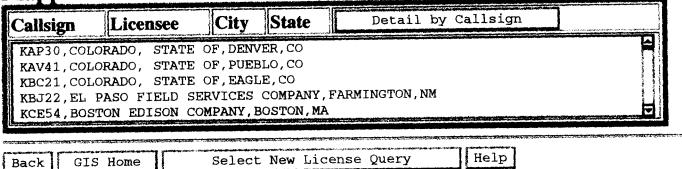
Send comments and questions to:

<betacomm@tcc.gov>

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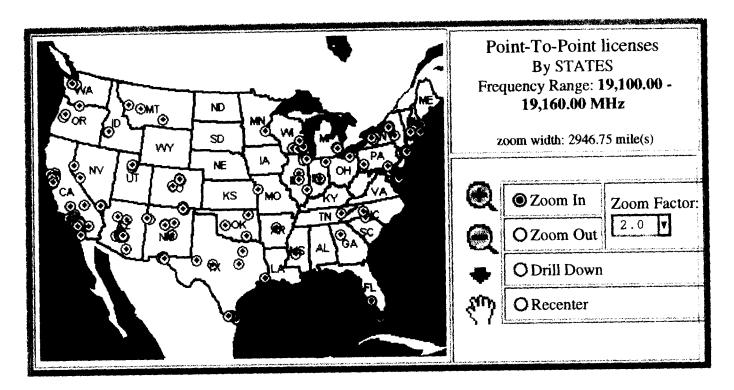


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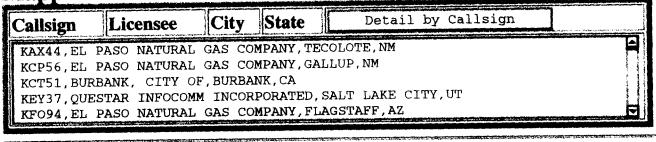


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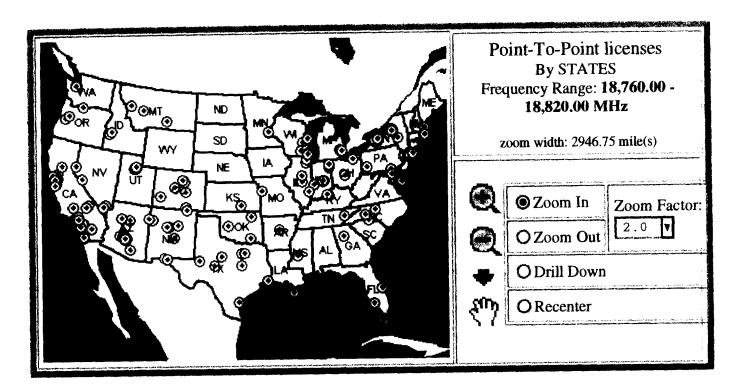
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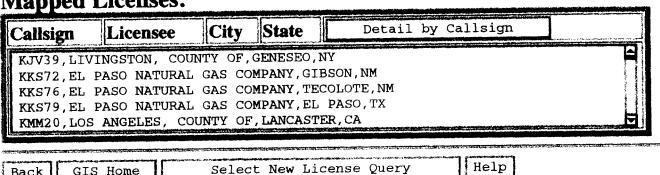
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RELOCATION



- Relocation to higher frequency band, for example 23 GHz. attenuation characteristics. dB without an increase in dish size due to higher will reduce reliability in an average 18 GHz path by 10-15
- Relocation to 38 GHz would decrease reliability even more authorized provider. than above. 38 GHz would need to be leased by an
- Relocation to a lower frequency raises cost of interconnect, frequencies may not be obtainable and dish sizes will to be increased from 1' and 2' to 4' and 6'.

RELOCATION (cont.)



- cannot be obtained currently without a waiver, which congested, therefore frequency availability is non-existent extends licensing period substantially. Much more 10 GHz Minimum dish size is 4'. Conditional license in some areas
- problems exist in many areas. 11 GHz Minimum dish size is 4'. Frequency congestion
- structurally loaded. Equipment cost higher. Congested have never been relinquished making it extremely difficult many building applications as well as towers which are to obtain 6 GHz microwave links in the Boston area. Bandwidth throughout Massachusetts. Many frequencies 6 GHz Minimum dish size is 6' which is unacceptable on



18 GHz Relocation Options

- Thousands of links to relocate
- Shared by all fixed microwave services
- 23 GHz has higher attenuation
- 11 GHz has higher minimum payload requirements, will require more complex modulation at higher cost.
- 11 GHz also proposed for satellite sharing
- 6 GHz band requires more expensive and much larger equipment
- Segmentation of 18 GHz band